

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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P. A., JR., an infant minor,

10-CV-04661(JG)(SMG)

Plaintiff,

DECLARATION

-against-

CITY OF NEW YORK; JOHN MATTINGLY, individually and in his capacity as Commissioner of the Administration for Children's Services; DEBORAH PRIDE, individually and in her capacity as a Child Protective Specialist for the Administration for Children's Services; NATALIA ROSADO, individually and in her capacity as a Child Protective Specialist for the Administration for Children's Services; ROSA SOSA, individually and in her capacity as a Child Protective Specialist for the Administration for Children's Services; ROBERT SALEMI, individually and in his Capacity as a Supervisor of Child Protective Specialists for the Administration for Children's Services; ST. VINCENT'S SERVICES, INC.; CARLINE ANDERSON, individually and in her capacity as a caseworker for St. Vincent's Services, Inc.; and ZOILA VILLALTA, individually and in her capacity as a supervisor of caseworkers for St. Vincent's Services, Inc.,

Defendants.

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I, Suzanne M. Halbardier, am over the age of eighteen, have personal knowledge of, and am competent to testify to, the fact set forth below, and declare the following to be true and correct pursuant to 28 U.S.C. Section 1746:

1. I am a member of the Bar of this Court and a member of the firm Barry, McTiernan & Moore, counsel for defendants, the City of New York, John Mattingly, Deborah Pride, Natalia Rosado, Rosa Sosa and Robert Salemi (hereinafter "City Defendants").

2. I respectfully submit this Declaration in opposition to P.A., JR.'s Motion to Compel Production and Response to the Interrogatories and for an Order Deferring Depositions.

3. I respectfully refer the Court to the Exhibits as attached to the subject motion of P.A., JR., as identified and set forth in the Declaration of Jonathan J. Lerner, and additionally do place before the Court true and accurate copies of the following documents:

<u>Exhibit</u>	<u>Document</u>
1	Letter from Suzanne Halbardier to Jonathan L. Lerner, et. al., dated February 9, 2012
2	Letter from Suzanne Halbardier to the Honorable Steven M. Gold, United States Chief Magistrate Judge, dated March 1, 2012
3	Email from Patrick G. Rideout to Suzanne Halbardier, et. al., dated June 8, 2012
4	Email from Patrick G. Rideout to Suzanne Halbardier, et. al., dated June 11, 2012

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 15, 2012
New York, New York

Suzanne M. Halbardier
Suzanne M. Halbardier

CERTIFICATE OF SERVICE

Suzanne M. Halbardier, an attorney duly admitted to practice law in the State of New York, hereby certifies that a true and accurate copy of the attached Declaration and Exhibits were served by ECF on June 15, 2012 to:

Robert Alexander Osuna, Esq.
Ambrose Wotorson, Esq.

Skadden Arps Slate Meagher & Flom LLP
Attorneys for Plaintiffs

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Suzanne M. Halbardier
SUZANNE M. HALBARDIER